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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PR Docket No. 92-235

In the matter of)
)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)
)

To: The Commission

REPLY COMMENTS OF Senses International, Inc.

Senses International makes the following Reply Comments in Docket 92-235. These Reply Comments are primarily referencing the Central Station radio operations found in the current 90.75 Rules.

Life-Safety Alarm Radio Systems

Senses wishes to reiterate the needs of the central station alarm industry for Life-Safety recognition, and again point out that it is the only one that expects intentional attack and sabotage as a routine matter. A failure of the telephone wire line in an alarm system will prevent the alarm system from reporting to the central monitoring station. The only way around this problem is to use radio reporting of alarm signals. The FCC must recognize the validity and necessity of Life-Safety grade radio alarm systems, and take the steps necessary to accord it the protection that it requires to meet the unique demands placed on it.

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The FCC needs to resolve the fundamental inconsistency with 1-way alarm radio inefficiency vis-a-vis the stated aims of this proceeding to increase spectrum efficiency. Repeatedly retransmitting the same message to overcome the deficiencies inherent in 1-way radio systems is spectrally inefficient and unnecessarily occupies an otherwise reusable channel. Senses again recommends that a schedule be established to phase out the use of one-way radio systems on Life-Safety radio channels. Such a schedule must allow for the orderly migration to new channel(s) as required over such a time period as will allow amortization of existing systems.

Senses restates its belief that the 20 channels made available under this proceeding be retained for the Central Station users. The Commission's attention is again drawn to the fact that all of the associated 465-466 frequencies were omitted from the Central Station frequency table. Hopefully unintended, this omission must be corrected.

Comments on the timetable for moving to the narrow channels has varied

timeframe, to provide for immediate relief. Existing 12.5 kHz offset users would be granted coprimary status on their existing channels but would not otherwise be affected. In the 2005 timeframe, after the radio industry has had time to spool up production of suitable equipment, all 12.5 channels are split into (2) 6.25 channels, instantly doubling the number of available channels.

Qualifications of Central Stations

In our original comments, Senses suggested a method whereby the Central Station frequencies might be allocated to UL and non-UL operations. Subsequent conversations with others in the alarm industry have pointed out how difficult it is to equitably define a Central Station operation. It appears that this is something along the lines of the Supreme Court justice discussing pornography.

Commission should set reasonable rules and standards for the use of the spectrum, always mindful of PICON, the Public Interest, Convenience Or Neccessity, based on sound engineering and operational practices. FCC rules should not unnecessarily obstruct the use of improving technology and advancements in the radio art, nor should they mandate the narrow use of only certain ways of accomplishing a needed end. We do not believe that forcing technology onto licensees simply because some assert that it can be done is a proper role for the FCC; rather, the marketplace will choose among the available alternatives to best suit each of the varied applications.

Senses Support of the Alarm Industry

As expressed in our initial comments and to the extent that they do not conflict with our positions, Senses again states its support for the comments and reply comments of the CSAA and AICC in this proceeding.

Conclusion

Senses supports the Commissions aims and goals to provide spectrum relief and increase efficiency, with the reservations stated herein and previously, and we thank the Commission for the opportunity to submit our ideas and comments in this Proceeding.

Respectfully submitted,

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